

REMARKS

Claims 1-36 and 41-49 remain in this application. Claims 37-40 have been canceled. Claims 1, 16, 18, 20, 26, 41, 43-44, and 47 have been amended. By these amendments, no new matter has been added.

Applicants affirm the election without traverse of Group I, consisting of the remaining Claims 1-36 and 41-49.

Before addressing the specific arguments put forth by the Examiner, an overview of the invention may be helpful for understanding its distinctive features and benefits, which set it far apart from the cited references. The present invention provides a system and method for exchanging information within a group of users, that promotes the organization and accretion of topical knowledge. Essentially, a system employing a method according to the invention will tend to accrete and organize knowledge in a potentially unlimited library of interrelated topics, thereby harnessing the combined knowledge of the group for efficient development and organization of knowledge.

These powerful benefits arise, in part, from providing users of the group an option to rate items of discrete information, including posts, links, or files, in relation to a defined topic; receiving ratings of comparative relevance of selected items to the topic from users in the group, and then, based on the rating data received from users, defining comparative relevance values for items of information equally for users in the group. Members of the group are provided equal access to relevance data distilled from their peers, and information competes openly for the highest rating.

Additional features of the invention complement these methods and enhance the results achieved. For example, users who contribute highly-rated items to the group may be recognized and rewarded in various ways. One form of reward comprises providing a hyperlink to a web site of a highly-valued user from a page of the system. Users may also be permitted to define new topics for related information exchange groups under certain conditions. A self-organizing, growing network of information

exchange groups can thus be engendered, providing topically-organized knowledge as a benefit to its users.

In contrast, the prior art lacks these features of the invention, and is incapable of achieving its results. Only Rose recognizes the benefit of a community of users in presenting information, but Rose teaches away from the invention. Rose is concerned with something entirely different: a predictive system in which presentation of information is tailored to the individual user. This is fairly summarized by Rose as "all available items of information are ranked in accordance with a *predicted* degree of relevance to the individual users." (Col. 8, lines 61-63 (emphasis added).) To accomplish this tailored, predictive result, Rose discloses an elaborate system for profiling users and comparing them to each other, for the purpose of predicting what each user will find interesting. (See, e.g., Col. 6, line 52 – Col. 8, line 56.)

Rose therefore suffers from several major limitations. For example, users are always haunted by their past actions, which are reflected in their user profiles and thereby affect the information that is predicted to be of interest to them. More fundamentally, by providing different information tailored for each user, Rose would cut off different users from the same view of relevance ranking data. According to Rose, therefore, the community of users is effectively cut to pieces. Lacking a common forum in which the value of information to a defined topic can be openly debated and systematically determined, no common valuation can be established. Organization of knowledge fails, and with it, incentives for contributing superior knowledge wither. In stark contrast, the present invention provides an open, equal forum for the competition of ideas, and is not concerned with predictive tailoring of information for individual users.

The secondary references – Davis and Maurille – do not make up for the severe deficiencies of Rose. These references merely reflect general technological background, and do not suggest or create any motivation to modify Rose so as to obtain the invention. Lacking even a minimal recognition of the organizing potential in a community of users, the secondary references are entirely unconcerned with the

systematic organization and development of topical knowledge. Thus, the application of these references constitutes nothing more than impermissible hindsight reconstruction of the invention. Moreover, even when combined with Rose, the references fail to disclose numerous elements of the invention, as pointed out more particularly in the traverses below.

The Examiner rejected Claims 1, 5-17, 29-35 and 41-43 under 35 U.S.C. § 103(a) as being unpatentable over Rose in view of Davis. These rejections are respectfully traversed.

As to independent Claims 1, 41, and 43, Rose and Davis, both separately, and in combination, fail to disclose or suggest:

- providing said users an option to rate each of said posts in relation to a defined topic;
- receiving rating data pertaining to selected ones of said posts from said users, wherein at least a portion of said rating data comprises ratings of comparative relevance of said selected ones of said posts to said defined topic, said ratings determined by said users after reviewing said selected ones of said posts;
- storing said rating data in said memory; and
- providing said users said rating data defining comparative relevance values associated with said selected ones of said posts equally for said users.

While many deficiencies are present, it should suffice to again point out that Rose teaches away from providing comparative relevance values equally for a group of users, and Davis, for its part, says nothing whatsoever about rating items of information for relevance to a defined topic. Therefore, no *prima facie* case of obviousness has been made out for these independent claims. The rejected dependent claims are all allowable as depending from an allowable base claim. These rejections should therefore be withdrawn.

Moreover, the references are lacking in numerous other respects, some of which are pointed out below. In addition to demonstrating additional reasons why the

Examiner has not made out a *prima facie* case as to many of the dependent claims, the numerous deficiencies of these references should underscore an emphatic conclusion that these references do not make the invention obvious.

With respect to Claim 12, Rose fails to disclose or suggest "associating said rating data recorded in said memory with at least one of said users according to at least one post provided by said at least one user to produce user-associated rating data." It is respectfully submitted that the Examiner may have misapprehended the meaning of this element, and/or of the disclosure cited in Rose. (Office Action, ¶ 16.) This element defines production of "user-associated rating data" comprising rating data for a user's *posts*. Rating data, as defined by Claim 1, is received "from said users" pertaining to selected posts. When parsed together with Claim 1, Claim 12 therefore defines, in essence, rating a user based on *other users' ratings of the user's posts* (or post). A user who submits posts of recognized superior quality can thereby be recognized and rewarded. Plainly, Rose does not disclose or suggest this element. Instead, Rose discloses a distinctly different aspect that "the user might be given the ability to specify others to whom the message should be directed." (Col. 5, lines 65-67.) Again, Rose is focused on personalizing a user's access to information, and completely ignores the benefits of competitive open rating.

Similarly, Rose is deficient with respect to Claims 13-15 that depend from Claim 12. Lacking any disclosure of "user-associated rating data" as defined by Claim 12, Rose cannot disclose or suggest any further use or manipulation of such data. Rose is deficient in other respects as to these claims, as well, but it should not be necessary to point out every deficiency.

With respect to Claims 1 and 16, and to the arguments set forth in ¶ 20 of the Office Action, Rose fails to disclose or suggest "providing said users an option to rate each of said posts in relation to a defined topic." Instead, Rose discloses identifying topics of interest to a user by analyzing the user's messages. According to Rose, there is no single topic against which many messages are rated. There is only the opposite

situation of identifying many topics inherent in a user's messages, without any gathering of relevance ratings from users as to these topics. Rose therefore presents no bar to patentability of Claims 1 and 16, for this additional reason. Similarly, Rose presents no bar to patentability of Claims 17-28 that depend from Claim 16.

Indeed, in discussing Claim 17 at ¶ 21 of the Office Action, the Examiner cites a portion of Rose that fairly summarizes its stark deficiency as to the invention defined by Claims 16, 17, and other claims depending from Claim 16: "all available items of information are ranked in accordance with a predicted degree of relevance to the individual users." (Col. 8, lines 61-63.) As already explained, this teaches away from the invention.

With respect to Claim 31 (see Office Action at ¶ 24), Applicants respectfully submit that Rose merely discloses an ordinary scroll bar at item 32 of Fig. 3. Rose fails to disclose or suggest "a tolerance bar for providing said at least one user an option to send preference information" as defined by Claim 31.

With respect to Claim 32 (Office Action, ¶ 25), Rose is deficient for reasons already noted with respect to user-associated rating data defined by Claim 12, from which Claim 32 depends. Rose merely discloses ranking items of information according to the predictive weights determined for an individual user, which do not in any way incorporate user ratings of other users. Rose fails to disclose or suggest filtering posts based on ratings for the users who contributed the posts.

With respect to Claim 34, the deficiencies of Rose with respect to collecting and using user ratings as to topical relevance have already been noted. In ¶ 27 of the Office Action, the Examiner argues that grouping of posts is disclosed by Rose at col. 8, line 57 – col. 9, line 4. The Applicants respectfully disagree. Rose merely discloses grouping messages according to predicted relevance to individual users, and fails to disclose or suggest grouping posts in a plurality of topically organized information exchange groups based on user-provided topical relevance data, as defined by Claim 34.

The Examiner rejected Claims 2-4, 18-28, 36 and 44-49 under 35 U.S.C. § 103(a) over Rose, Davis, and Maurille. These rejections are respectfully traversed. Maurille does not make up for the deficiencies of Rose and Davis. Maurille merely discloses a message board system with a few minor enhancements relating to message threading and user-specified messaging modes. Maurille fails to disclose or suggest:

- providing said users an option to rate each of said posts in relation to a defined topic;
- receiving rating data pertaining to selected ones of said posts from said users, wherein at least a portion of said rating data comprises ratings of comparative relevance of said selected ones of said posts to said defined topic, said ratings determined by said users after reviewing said selected ones of said posts;
- storing said rating data in said memory; and
- providing said users said rating data defining comparative relevance values associated with said selected ones of said posts equally for said users

as defined by Claims 1 and 41, and similarly defined by Claim 43. All of the rejected claims are allowable as depending from one of these allowable base claims. These rejections should therefore be withdrawn. Numerous further deficiencies of Maurille, Rose, and Davis are noted below, further demonstrating that these references do not make the invention obvious.

With respect to Claim 18 (discussed at ¶ 36 of the Office Action), Maurille fails to disclose or suggest a web page for users to contribute posts, having "a plurality of links to a plurality of related Web pages containing additional information relevant to said topic." At col. 4, lines 27-34, Maurille merely discloses responding to a message posted on a message board by clicking on a link in the message. Maurille fails to disclose or suggest the Web page defined by Claim 18, for at least the following reasons: (a) the message containing the link disclosed by Maurille is not used to provide "an option to contribute at least one of said posts"; (b) the blank response page that Maurille discloses popping up after the link is clicked does not contain information "in addition to

said posts"; (c) the message of Maurille is not disclosed to contain a "plurality of links," but only a single link; and (d) the web page disclosed by Maurille to display the messages does not include "a plurality of links to a plurality of related Web pages containing information relevant to said topic, in addition to said posts." The foregoing differences show that Maurille fails to disclose or suggest the invention defined by Claim 18.

With respect to Claim 19 (discussed at ¶ 37 of the Office Action), having acknowledged in ¶ 36 that Rose fails to disclose the Web page with a plurality of links to a plurality of related Web pages, it cannot logically be maintained that Rose discloses providing an option to rate such related Web pages, as defined by Claim 19 and its base Claim 18. Indeed, Rose fails to disclose or suggest any such thing. At col. 8, lines 24-36, Rose discloses a completely unrelated concept of using a neural network to predict a user's interest in message, which in no way discloses or suggests the invention defined by Claim 19.

Rose is similarly deficient with respect to Claim 20, which depends from Claim 19. In ¶ 38 of the Office Action, the Examiner argues that receiving link rating data is disclosed at col. 8, lines 36-44. But as the Examiner has acknowledged, Rose fails to disclose the Web page with a plurality of links to a plurality of related Web pages. It follows that Rose cannot disclose receiving anything pertaining to such undisclosed links. Indeed, col. 8, lines 36-44 discloses an entirely unrelated concept of using a neural network scheme to predict the relatedness of objects, that does not involve any user ratings of linked Web pages. Similarly, Rose fails to disclose or suggest ranking any plurality of links, as defined by Claim 21 and its base claims.

In ¶ 40 of the Office Action, the Examiner argues that Figure 9 of Maurille discloses links to the plurality of related Web pages on a menu, as defined by Claim 22. This argument fails. Figure 9 merely shows a web page displaying a user's mail folder with links to the messages in the folder. Five command buttons are shown at the bottom of the page. No links to any plurality of Web pages containing topically relevant

information in addition to said posts are shown anywhere in Figure 9, either in a menu or otherwise. Instead, this figure merely discloses a way for organizing a presentation of messages in a mail folder. Maurille fails to disclose or suggest the invention as defined by Claim 22 and its base claims.

With respect to Claim 23 (discussed at ¶ 41 of the Office Action), Maurille fails to disclose or suggest links to a plurality of web pages containing relevant topical information in addition to said posts, organized by category in a plurality of menus. An exemplary one of such menus 1160 is shown in Fig. 11C of the application, discussed at pp. 45-46. In comparison, Figure 7C of Maurille merely discloses a conference session (i.e., "chat") page with separate frames for displaying an agenda, a list of participants, and chronological list of user comments. At most, this figure discloses displaying a topic for the chat session in frame 772. Figure 7C, and all the rest of Maurille, fails to disclose or suggest any plurality of links to web pages containing topically relevant information in addition to the user posts. Therefore, Maurille fails to disclose or suggest the invention as defined by Claim 23.

Similarly, Maurille fails to disclose or suggest the invention as defined by Claim 24. At ¶ 42, the Examiner cites Figure 9 as disclosing the invention. Claim 24 depends from Claim 22, and the deficiencies of Figure 9 have already been demonstrated in connection with Claim 22. Figure 9, and all the rest of Maurille, is by logical necessity also deficient with respect to the additional limitations defined by Claim 24.

With respect to Claim 25, at ¶ 43 of the Office Action, the Examiner argues that item 142 of Figure 3B discloses receiving link rating data pertaining to a link to a web page that is configured to display posts relating to a second topic, as defined by Claim 25. This is not true. Item 142 discloses a message table. No link of any kind is disclosed, much less to a link to another web page configured to display posts related to a second topic. A thread identifier does not disclose or suggest such a link, because, among other things, it fails to disclose or suggest a separate page with posts relevant to a second topic. Maurille fails to disclose or suggest any link to a page with posts



relevant to a second topic, as defined by Claim 25.

With respect to Claim 26, Maurille fails to disclose or suggest a web page with a "plurality of links to a plurality of related Web pages containing information relevant to said topic, in addition to said posts," as defined by Claim 26. This deficiency has already been demonstrated in connection with Claim 18. Maurille at col. 19, lines 16-33 (cited at ¶ 44 of the Office Action) does not make up for the deficiencies already noted. At 19:16-33, Maurille merely discloses the entirely unrelated concept of a talk dialog screen for entering text messages during on-line chat sessions. No links to any page containing topical information in addition to the posts are disclosed or suggested. Maurille fails to disclose or suggest the invention as defined by Claim 26.

With respect to Claim 27, which depends from Claim 26, Maurille by logical necessity fails to disclose or suggest counting or making any other use of a link that it does not disclose. At col. 8, lines 32-37 (cited at ¶ 45), Maurille merely discloses keeping track of a message post's relationship to other posts in the same thread. No links to any topical information in addition to the posts are disclosed or suggested. Similarly, Maurille fails to disclose or suggest the invention as defined in Claim 28.

With respect to Claim 36, Maurille fails to disclose or to suggest receiving an address for a Web page from a founding user and providing a link to the founder's page on the Web page that displays the user posts. A "founding user" refers to a user who founds "said Web page," i.e., the topically-relevant Web page containing user posts. Further description of a founding process and founders is provided at pages 18-20 of the application. At ¶ 47 of the Office Action, the Examiner argues that Figure 4C discloses these steps. But, it does not. Figure 4C is "an image of a private communication board screen on which instant messages owned by a second user are presented." Col. 5, lines 18-20. The "second user" is a user engaged in an exchange of messages with another user. Col. 14, lines 42-48. Neither communication board page provides a link to a page provided by a user that has founded the page containing the message posts. Maurille fails to disclose or suggest the invention as defined by

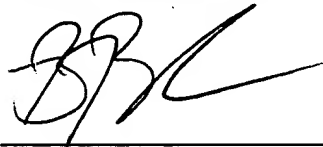
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Claim 36.

In view of the foregoing, the Applicants respectfully submit that Claims 1-36 and 41-49 are in condition for allowance. Reconsideration and withdrawal of the rejections is respectfully requested, and a timely Notice of Allowability is solicited. If it would be helpful to placing this application in condition for allowance, Applicants encourage the Examiner to contact the undersigned counsel and conduct a telephonic interview.

To the extent necessary, Applicants petition the Commissioner for a one-month extension of time, extending to April 5, 2004 (the first business day following April 4, 2004), the period for response to the Office Action dated December 4, 2003. The Commissioner is authorized to charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0639.

Respectfully submitted,



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